

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

LINDA K. HENRY,

Plaintiff,

V.

**SWIFT TRANSPORTATION SERVICES,
LLC and JESSE LEE WILLIAM
LINBOOM,**

Defendants.

)
)
)
)
)
)
)
)
)
)

NO. _____

JUDGE _____

MAGISTRATE JUDGE _____

NOTICE OF FILING OF REMOVAL TO PLAINTIFF'S ATTORNEYS

To: Jennifer H. Collins, Esq.
James R. Davis, Jr., Esq.
REAVES LAW FIRM, PLLC
4466 Elvis Presley Boulevard, Suite 310
Memphis, TN 38116

Notice is hereby given that the Defendant, Swift Transportation Services, LLC, in the above-styled cause heretofore filed in the Circuit Court of Shelby County, Tennessee, at Memphis, has this day filed in the District Court of the United States for the Western District of Tennessee, in the office of the Clerk thereof, in Memphis, Tennessee, a Notice of Removal of this cause from the state court to the District Court and has attached to the Notice of Removal the Complaint and other initial file documents. A copy of the Notice of Removal is attached hereto and served herewith.

This 10th day of April, 2019.



Respectfully submitted,

LEWIS THOMASON

By: /s/ John R. Tarpley

John R. Tarpley, BPR # 9661
424 Church Street, Suite 2500
P.O. Box 198615
Nashville, TN 37219
(615) 259-1366

*Attorneys for Defendant Swift Transportation
Services, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing NOTICE OF FILING OF REMOVAL TO PLAINTIFF'S ATTORNEY was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

Jennifer H. Collins, Esq.
James R. Davis, Jr., Esq.
REAVES LAW FIRM, PLLC
4466 Elvis Presley Boulevard, Suite 310
Memphis, TN 38116

This the 10th day of April, 2019.

/s/ John R. Tarpley

IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

LINDA K. HENRY,

Plaintiff,

V.

**SWIFT TRANSPORTATION SERVICES,
LLC and JESSE LEE WILLIAM
LINBOOM,**

Defendants.

)
)
)
)
)
)
)
)
)

No. CT-1027-19

DIVISION VII

JURY DEMAND

NOTICE OF FILING OF NOTICE OF REMOVAL TO FEDERAL COURT

To: Ms. Temiika D. Gipson
Shelby County Circuit Court Clerk
140 Adams Avenue, Room 324
Memphis, TN 38103

Please take notice that defendant Swift Transportation Services, LLC, by and through counsel, pursuant to 28 U.S.C. § 1441, *et seq.*, has filed in the United States District Court for the Western District of Tennessee a Notice of Removal of the above-captioned cause of action from Shelby County Circuit Court to the United States District Court for the Western District of Tennessee. A copy of the Notice of Removal is attached as **Exhibit 1**. The basis for removal of this cause of action is diversity jurisdiction and an amount in controversy exceeding \$75,000.00, which places original jurisdiction over this matter with the District Court. Pursuant to 28 U.S.C. § 1446(d), the Shelby County Circuit Court shall proceed no further on this case unless and until the case is remanded by the United States District Court for the Western District of Tennessee.

Please promptly acknowledge receipt and filing of this Notice and the copy of the Notice of Removal in your office by completing and signing the Acknowledgment found on the second page of this Notice, an extra copy of which is enclosed for this purpose, with the request that it be returned when signed.

ACKNOWLEDGEMENT

I, Temiika D. Gipson, Circuit Court Clerk of Shelby County, Tennessee, do hereby acknowledge receipt of the above notice and papers referred to therein, and certify that I have on the date and hour below stated, filed the said copy of the Notice to remove this cause to the United States District Court at Nashville, Tennessee, this _____ day of April, 2019.

Circuit Court Clerk of Shelby County, Tennessee

Respectfully submitted,

LEWIS THOMASON

By: 
John R. Tarpley, BPR # 9661
424 Church Street, Suite 2500
P.O. Box 198615
Nashville, TN 37219
(615) 259-1366

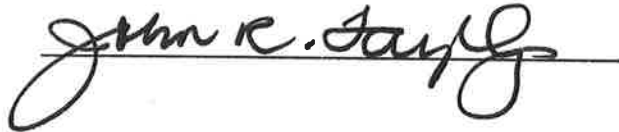
*Attorneys for Defendant Swift Transportation
Services, LLC*

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served on the following counsel of record by placing postage prepaid envelope in United States Mail Service, addressed to:

Jennifer H. Collins, Esq.
James R. Davis, Jr., Esq.
REAVES LAW FIRM, PLLC
4466 Elvis Presley Boulevard, Suite 310
Memphis, TN 38116

This the 10th day of April, 2019.

A handwritten signature in black ink, appearing to read "John R. Davis, Jr.", is written over a horizontal line.